

EXHIBIT “C”

AO 88A (Rev. 12/13) Subpoena to Testify at a Deposition in a Civil Action

# UNITED STATES DISTRICT COURT

for the

Southern District of New York

ALEX HOLMES, ET AL.

*Plaintiff*

v.

CHET MINING CO, LLC, CHET MINING CO  
CANADA LTD and CHET STOJANOVICH

*Defendant*

Civil Action No. 7:20-CV-0448-UA

## SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: CHET MINING CO., LLC, CHET MINING CO CANADA LTD and CHET STOJANOVICH

*(Name of person to whom this subpoena is directed)*

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: [https://us04web.zoom.us/j/76373222453?](https://us04web.zoom.us/j/76373222453?pwd=SEZTTIRnREpFMnFaUzlUUUnIDNXc2QT09)  
pwd=SEZTTIRnREpFMnFaUzlUUUnIDNXc2QT09  
Meeting ID: 763 7322 2453 Pass: 5SiU86

Date and Time:

03/29/2021 11:00 am

The deposition will be recorded by this method: Stenographer and video

☒ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: See Exhibit "A" attached hereto. Kindly provide all documents requested two (2) weeks prior to deposition via e-mail to [jharwick@joneshacker.com](mailto:jharwick@joneshacker.com).

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 01/29/2021

CLERK OF COURT

OR

*Signature of Clerk or Deputy Clerk*

*Attorney's signature*

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* John F. Harwick,  
Representing all Plaintiffs, who issues or requests this subpoena, are:

E. Stewart Jones Hacker Murphy LLP, 28 Second Street, Troy NY 12180, [jharwick@joneshacker.com](mailto:jharwick@joneshacker.com), (518) 213-0113

### Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

**Exhibit A**

Produce the following items relating to Chet Mining Co., LLC, Chet Mining Co Canada

LTD and Chet Stojanovich (collectively the “Debtors”) for the past six (6) years:

1. All documents showing loans to others;
2. General ledger and checkbooks;
3. Federal and State Income Tax Returns, including all schedules and amendments;
4. Bank account statements (*e.g.*, cash accounts, checking accounts, savings accounts);
5. Certificates of deposit;
6. Balance sheets;
7. A list of assets and/or inventory owned or leased ;
8. Any documents showing monies owed to the Debtors;
9. A list of all accounts receivable, with the debtor’s addresses;
10. Documents showing any transactions with insiders (*e.g.* employees, shareholders, members, owners, officers or directors of the Debtors);
11. Financial statements;
12. Deeds to any and all real property owned or controlled;
13. Documents showing ownership, leasing or control of any real property, equipment, boat, aircraft or vehicles;
14. Appraisals of any real or personal property owned;
15. Loan and/or line of credit applications;
16. All audited or unaudited financial statements and disclosures;
17. Audit reports;
18. UCC filings and financing statutes;
19. Payroll account records;
20. Shareholder agreements;
21. Operating agreements of any LLC owned or operated by Debtors;
22. LLC or Corporate minutes, books and records;
23. Insurance policies;
24. Titles to any and all vehicles, boats, aircrafts and/or equipment;
25. Wills;
26. Trusts where the Debtors are beneficiaries or grantors;
27. Retirement account statements;
28. Investment accounts statements;
29. Securities certificates;
30. Stock options;
31. Commodity account statements;
32. Broker margin account statements;
33. Written itemization of all cash and crypto currency held by or on behalf of the Debtors;
34. Safe deposit box records and the contents of safe deposit boxes;
35. Credit card statements and applications;
36. Loan applications;

37. Mortgages, mortgage statements and applications;
38. Loan and line of credit documents and written statements;
39. A statement of net worth;
40. Divorce proceeding records;
41. Contingent interests (*e.g.*, stock options, interests subject to life estates, prospective inheritances);
42. Tax shelter investment records;
43. Debt collection records;
44. Judgments;
45. Pleadings in all lawsuits where the Debtor is a party;
46. Arbitration papers and awards where the Debtor is a party;
47. Documents showing ownership of patents;
48. Documents showing ownership of trademarks;
49. Documents showing ownership of copyrights;
50. Documents showing ownership of intellectual property;
51. Any evidence of gifts to others;
52. All cryptocurrency records/statements;
53. Software and hardware wallets;
54. Warm and cold storage units;
55. Information and statements for all cryptocurrency exchange, brokerage and investments accounts;
56. All mobile devices including phone and/or tablets;
57. All cryptocurrency information contained on servers, computers and laptops;
58. All cloud and edge computing accounting data related to cryptocurrency;
59. All cryptocurrency account information such as Kraken, Coinbase, Gemini, et al;
60. All Keystone files and crypto wallet passphrases; and
61. Any other information, documents or electronic data showing ownership or control of any cryptocurrency.

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

Plaintiff / Petitioner:

ALEX HOLMES, ET AL.

Defendant / Respondent:

CHET MINING CO, LLC, ET AL.

## AFFIDAVIT OF SERVICE

Case No:

7:20-cv-04448-UA

The undersigned being duly sworn, deposes and says; deponent is not a party herein, is over 18 years of age and resides in the state of New York. On Fri, Feb 19 2021 AT 08:51 AM AT 105 Duane St Apt 20F, New York, NY 10007 deponent served the within SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION on CHET STOJANOVICH

- ☐ Individual: by delivering a true copy of each to said defendant, personally; deponent knew the person so served to be the person described as said defendant therein.
- ☐ Corporation: \_\_\_\_\_ a defendant, therein named, by delivering a true copy of each to \_\_\_\_\_ personally, deponent knew said corporation so served to be the corporation described, and knew said individual to be \_\_\_\_\_ thereof.
- ☐ Suitable Person: by delivering thereat, a true copy of each to \_\_\_\_\_ a person of suitable age and discretion.
- ☒ Affixing to Door: by affixing a true copy of each to the door thereof, deponent was unable with due diligence to find defendant, or a person of suitable age or discretion thereat, having called thereon; at  
1) 02/10/2021 @ 09:47 AM 2) 02/16/2021 @ 11:53 AM 3) 02/18/2021 @ 05:55 PM 4) 02/19/2021 @ 08:51 AM
- ☒ Mailing: Deponent also enclosed a copy of same, in a postpaid sealed wrapper properly addressed to said defendant at defendant's last known residence, 105 Duane St Apt 20F, New York, NY 10007, and depositing said wrapper in a post office, official depository under the exclusive care and custody of the United States Post Office, department, with New York State. Mailed on Sat, Feb 20 2021.
- ☒ Military Service: I asked the person spoken to whether defendant was in active military service of the United States or of the State of New York in any capacity whatever and received a negative reply. Defendant wore ordinary civilian clothes and no military uniform. The source of my information and the ground of my belief are the conversations and observations above narrated. Upon information and belief I aver that the defendant is not in the military service of New York State or of the United States as that term is defined in either the State or in the Federal statutes.

## Description:

Age: \_\_\_\_\_ Ethnicity: \_\_\_\_\_ Gender: \_\_\_\_\_ Weight: \_\_\_\_\_  
Height: \_\_\_\_\_ Hair: \_\_\_\_\_ Eyes: \_\_\_\_\_ Relationship: \_\_\_\_\_  
Other: \_\_\_\_\_

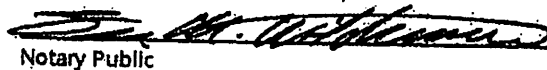
- 1.) Gray door with "Ring" doorbell and gray walls.
- 2.) Black and brown carpet.
- 3.) Apartment located across hallway and approximately ten feet from Stairwell B.



David Meaney  
Lic. No. 2085682-DCA

David A. Meaney  
1864 Lexington Ave. 2S  
New York, NY 10029  
(917) 837-3803

Sworn to before me on February 22, 2021

  
Notary Public

IAN M. WILDMAN  
Notary Public, State of New York  
No. 01W16324861  
Qualified in New York County  
Commission Expires May 18, 2023

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ALEX HOLMES, ET AL.,

Plaintiff(s)

Affidavit of Service

-against-

CHET MINING CO, LLC, ET AL.,

Index No.

7:20-cv-04448-UA

Defendant(s)

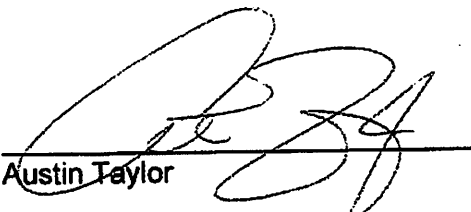
STATE OF NEW YORK     )  
                                      )SS.:  
COUNTY OF ALBANY     )

AUSTIN TAYLOR, being duly sworn, deposes and says: that I am over the age of eighteen (18) years, and reside in Voorheesville, New York;

On February 5, 2021, at 2:25 p.m. I served a SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION, on Defendant, CHET MINING CO CANADA, LTD, by personally delivering to and leaving with Nancy Dougherty, a white female approximately 65 years of age, said to be a Business Document Specialist, in the Corporation Division of the Department of State, of the State of New York, at 99 Washington Avenue Albany, New York, two true copies thereof, and at the same time paid the required fee of Forty (\$40.00) Dollars, pursuant to section 304 of the Limited Liability Company Law of the State of New York.

That deponent personally knew said Nancy Dougherty to be a Business Document Specialist in the Corporation Division of the Department of State of the State of New York, and a person duly authorized to accept service upon the Secretary of State of New York.

On February 8, 2021, deponent mailed a copy of said documents to CHET MINING CO CANADA, LTD, by enclosing same in a postage pre-paid envelope, through Registered Mail, # RB705177114US; Return Receipt #9590 9402 4986 9063 2997 17, to 105 Duane St Apt. 20F, New York, NY 10007.

  
Austin Taylor

Sworn before me this  
9<sup>th</sup> day of February, 2021

  
Notary Public, State of New York

CHRISTOPHER E. NEUMEISTER  
Notary Public, State of New York  
Reg. No. 01NE6409273  
Qualified in Albany County  
Commission Expires 09/28/2024

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ALEX HOLMES, ET AL.,

Plaintiff(s)

**Affidavit of Service**

-against-

CHET MINING CO, LLC, ET AL.,

**Case No.**  
7:20-cv-04448-UA

Defendant(s)

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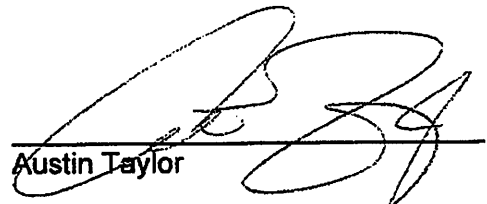
STATE OF NEW YORK     )  
                                      )SS.:  
COUNTY OF ALBANY     )

**AUSTIN TAYLOR**, being duly sworn, deposes and says: that I am over the age of eighteen (18) years, and reside in Voorheesville, New York;


On February 5, 2021, at 2:25 p.m. I served a SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION, on Defendant, CHET MINING CO, LLC by personally delivering to and leaving with Nancy Dougherty, a white female approximately 65 years of age, said to be a Business Document Specialist, in the Corporation Division of the Department of State, of the State of New York, at 99 Washington Avenue Albany, New York, two true copies thereof, and at the same time paid the required fee of Forty (\$40.00) Dollars, pursuant to section 304 of the Limited Liability Company Law of the State of New York.

That deponent personally knew said Nancy Dougherty to be a Business Document Specialist in the Corporation Division of the Department of State of the State of New York, and a person duly authorized to accept service upon the Secretary of State of New York.

On February 8, 2020, deponent mailed a copy of said documents to CHET MINING CO, LLC, by enclosing same in a postage pre-paid envelope, through Registered Mail, # RB705177128US; Return Receipt #9590 9402 4986 9063 2997 00, to 105 Duane St Apt. 20F, New York, NY 10007.

  
Austin Taylor

Sworn before me this  
9<sup>th</sup> day of February, 2021

  
\_\_\_\_\_  
Notary Public - State of New York  
CHRISTOPHER E. NEUMEISTER  
Notary Public, State of New York  
Reg. No. 01NE6409273  
Qualified in Albany County  
Commission Expires 09/28/2024